

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

V.

HUAWEI TECHNOLOGIES CO., LTD.
and HUAWEI TECHNOLOGIES USA
INC.,

Defendants.

§ § § § § § § § § § § § § § § §

CIVIL ACTION NO. 6:20-cv-533-ADA

JURY TRIAL DEMANDED

PLAINTIFF'S ANSWER TO DEFENDANTS' FIRST AMENDED COUNTERCLAIMS

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development hereby submits its Answer to Defendants' First Amended Counterclaims ("Counterclaims"). Plaintiff denies all allegations in the Counterclaims not specifically admitted below. In responding to the Counterclaims, Plaintiff uses headings employed by Defendants strictly as a convenience to the Court and does not admit any allegation made in, or inference suggested by, such headings. Plaintiff answers the numbered paragraphs of the Counterclaims as follows:

THE PARTIES AND NATURE OF THE ACTION

1. Plaintiff admits the allegations in paragraph 1 of the Counterclaims.
2. Plaintiff admits only that Huawei Technologies USA is a corporation organized and existing under the laws of Texas that maintains an established place of business at 2391 NE Interstate 410 Loop, San Antonio, TX 78217. Otherwise, Plaintiff denies the allegations in paragraph 2 of the Counterclaims.
3. Plaintiff admits the allegations in paragraph 3 of the Counterclaims.

4. Plaintiff admits only that the Counterclaims speak for themselves. Otherwise, Plaintiff denies the allegations in paragraph 4 of the Counterclaims and denies that Defendants are entitled to the relief they request.

JURISDICTION AND VENUE

5. Plaintiff admits that this Court has jurisdiction over Plaintiff's claims. Otherwise, denied.

6. Plaintiff admits that this Court has jurisdiction over Plaintiff's claims. Otherwise, denied.

7. Plaintiff admits venue is proper in this Court. Otherwise, denied.

COUNT I – DECLARATION OF INVALIDITY OF THE '627 PATENT

8. To the extent a response is required to paragraph 8 of the Counterclaims, denied.

9. Plaintiff admits a judicial controversy has arisen concerning Defendants' infringement of the patent-in-suit. Otherwise, denied.

10. Plaintiff denies the allegations in paragraph 10.

11. Plaintiff denies the allegations in paragraph 11.

12. Plaintiff denies the allegations in paragraph 12.

13. Plaintiff denies the allegations in paragraph 13.

COUNT II – DECLARATION OF NON-INFRINGEMENT OF THE '627 PATENT

14. To the extent a response is required to paragraph 14 of the Counterclaims, denied.

15. Plaintiff admits a judicial controversy has arisen concerning Defendants' infringement of the patent-in-suit. Otherwise, denied.

16. Plaintiff denies the allegations in paragraph 16.

17. Plaintiff denies the allegations in paragraph 17.

18. Plaintiff denies the allegations in paragraph 18.

19. Plaintiff denies the allegations in paragraph 19.

JURY DEMAND

Plaintiff admits this paragraph contains a demand for jury trial to which no response is required.

PRAYER FOR RELIEF

Plaintiff denies any factual assertions in the Request for Relief and further denies that Defendants are entitled to any of the relief sought in the Request for Relief.

All allegations in Defendants' counterclaims that are not specifically admitted herein are denied.

Dated: November 3, 2020

Respectfully submitted,

/s/ Ryan S. Loveless

James L. Etheridge
Texas State Bar No. 24059147
Ryan S. Loveless
Texas State Bar No. 24036997
Brett A. Mangrum
Texas State Bar No. 24065671
Travis Lee Richins
Texas State Bar No. 24061296
ETHERIDGE LAW GROUP, PLLC
2600 E. Southlake Blvd., Suite 120 / 324
Southlake, Texas 76092
Telephone: (817) 470-7249
Facsimile: (817) 887-5950
Jim@EtheridgeLaw.com
Ryan@EtheridgeLaw.com
Brett@EtheridgeLaw.com
Travis@EtheridgeLaw.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on November 3, 2020 the foregoing document was served upon all counsel of record via the court's electronic filing system in accordance with the Federal Rules of Civil Procedure.

/s/ Ryan S. Loveless

Ryan S. Loveless